

EXHIBIT B

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TRAVIS MOREDA DAIRY and TRAVIS MOREDA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CALIFORNIANS FOR ALTERNATIVES TO
TOXICS,

Plaintiff,

vs.

TRAVIS MOREDA DAIRY and TRAVIS
MOREDA,

Defendants.

Case No. 3:24-CV-06632-SI

[Assigned for All Purposes to the Honorable
Susan Illston, Department 1]

**DEFENDANTS' RESPONSES TO
PLAINTIFF'S INTERROGATORIES,
SET ONE**

Complaint Filed: September 20, 2024

**PROPOUNDING PARTY: Plaintiff CALIFORNIANS FOR ALTERNATIVES TO
TOXICS**

**RESPONDING PARTIES: Defendants TRAVIS MOREDA DAIRY and TRAVIS
MOREDA**

SET NUMBER: ONE

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Defendants TRAVIS MOREDA DAIRY and TRAVIS MOREDA (“Travis”), hereby submit these objections and responses to the Interrogatories, Set One, of CALIFORNIANS FOR ALTERNATIVES TO TOXICS (“Plaintiff”), as follows:

PRELIMINARY STATEMENT

Nothing in this response should be construed as an admission by Travis with respect to the admissibility or relevance of any fact or document, or of the truth or accuracy of any characterization or statement of any kind contained in Plaintiff’s Requests for Interrogatories, Set One. Travis has not fully completed his discovery and investigation of the facts relating to this case and has not completed preparation for trial. The responses contained herein are based only upon such information and documents which are currently available, and specifically known, to Travis. Travis responds based only on those contentions and information which are presently known.

It is anticipated that further discovery, independent investigation, legal research, and analysis may supply additional facts, add meaning to known facts, and establish entirely new factual conclusions and legal contentions, all of which may lead to substantial additions to, changes in, and variations from the responses set forth herein.

The following objections and responses are given without prejudice to Travis’ right to produce evidence at trial, or otherwise, regarding any subsequently discovered facts or information. Travis reserves the right to modify and amend any and all responses herein as additional facts are ascertained, as analysis and contentions are made, or as research is completed.

RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 1:

IDENTIFY each National Pollutant Discharge Elimination System (“NPDES”) permit, including general or individual coverage, held by YOU at any time since July 11, 2019, for the FACILITY, and describe the scope of coverage, effective dates, and permit numbers.

RESPONSE TO INTERROGATORY NO. 1:

Travis incorporates his Preliminary Statement as if fully set forth herein. Travis further

1 objects that this Interrogatory, including but not limited to its stated time period, is overbroad,
2 unduly burdensome, and disproportionate to the needs of the case. Travis further objects to the use
3 of the terms “scope of coverage,” “effective dates,” and “permit numbers” as vague and ambiguous.

4 Subject to and without waiving the foregoing objections, Travis responds as follows: Per
5 the requirements of the San Francisco Bay Regional Water Quality Control Board, Travis is
6 covered by a general permit under the terms of Order No. R2-2016-0031. Travis does not discharge
7 nor intend to discharge to surface water and therefore is not required to obtain coverage under an
8 NPDES permit.

9 **INTERROGATORY NO. 2:**

10 State the total number of mature dairy cows, calves, and any other livestock confined at the
11 FACILITY at any time from July 11, 2019, to the present, including the duration of confinement
12 and whether any crops, vegetation, or forage were sustained in the areas of confinement during that
13 time.

14 **RESPONSE TO INTERROGATORY NO. 2:**

15 Travis incorporates his Preliminary Statement as if fully set forth herein. Travis further
16 objects that this Interrogatory, including but not limited to its stated time period, is overbroad,
17 unduly burdensome, and disproportionate to the needs of the case. Travis further objects to this
18 Interrogatory as compound, as it includes multiple separate inquiries that should be broken down
19 into distinct interrogatories. Travis further objects to the use of the terms “crops,” “vegetation,”
20 “forage,” “sustained,” and “areas of confinement” as vague and ambiguous.

21 Subject to and without waiving the foregoing objections, Travis responds as follows: The
22 total number of mature dairy cows, calves, and any other livestock confined is approximately 50–
23 120. Duration varies based on seasonal factors, however mature cows are only confined for
24 approximately 58% of the time, calves are only housed for approximately two months. Vegetation
25 is sustained.

26 **INTERROGATORY NO. 3:**

27 DESCRIBE all DISCHARGES of POLLUTANTS, including but not limited to
28 STORMWATER containing POLLUTANTS, manure, process wastewater, and washwater, from

1 the FACILITY from July 11, 2019, to the present, including the date, nature, volume, duration, and
2 receiving waterbody of each DISCHARGE.

3 **RESPONSE TO INTERROGATORY NO. 3:**

4 Travis incorporates his Preliminary Statement as if fully set forth herein. Travis further
5 objects to the stated time period as overbroad, unduly burdensome, and disproportionate to the
6 needs of the case. Travis further objects to the use of the terms “process wastewater” and
7 “washwater” as vague and ambiguous.

8 Subject to and without waiving the foregoing objections, Travis responds as follows: Travis
9 does not discharge to jurisdictional waters. Water from his dairy is captured by his existing water
10 management and retention systems and applied to land in accordance with his Nutrient
11 Management Plan and in compliance with Order No. R2-2016-0031.

12 **INTERROGATORY NO. 4:**

13 IDENTIFY and DESCRIBE all structures and systems at the FACILITY used to manage
14 or store manure, process wastewater, and STORMWATER runoff, including the size, design
15 capacity, and operational procedures for each system, and the date each system was installed.

16 **RESPONSE TO INTERROGATORY NO. 4:**

17 Travis incorporates his Preliminary Statement as if fully set forth herein. Travis further
18 objects that this Interrogatory is overbroad, unduly burdensome, and disproportionate to the needs
19 of the case. Travis further objects that documents sufficient to respond to this Interrogatory are
20 equally available to or already in the possession, custody or control of Plaintiff, including
21 documents already produced in this action. Travis further objects to the use of the terms “structures
22 and systems,” “design capacity,” “operational procedures,” and “installed” as vague and
23 ambiguous.

24 Subject to and without waiving the foregoing objections, Travis responds as follows: See
25 Travis’ Waste Management and Nutrient Management Plans, previously produced as
26 TMD_000001–000125.

27 **INTERROGATORY NO. 5:**

28 IDENTIFY all incidents since July 11, 2019, where any retention basin, lagoon, or other

manure or wastewater storage structure at the FACILITY exceeded its storage capacity or DISCHARGED material to surface waters, including the date, duration, and estimated volume of any such overflow or DISCHARGE.

RESPONSE TO INTERROGATORY NO. 5:

Travis incorporates his Preliminary Statement as if fully set forth herein. Travis further objects to the stated time period as overbroad, unduly burdensome, and disproportionate to the needs of the case. Travis further objects to the use of the terms “incidents,” “wastewater storage structure,” “material,” and “overflow” as vague and ambiguous. Travis further objects that documents sufficient to respond to this Request are equally available to or already in the possession, custody or control of Plaintiff.

Subject to and without waiving the foregoing objections, Travis responds as follows: Travis does not discharge to jurisdictional waters. Water from his dairy is captured by his existing water management and retention systems and applied to land in accordance with his Nutrient Management Plan.

INTERROGATORY NO. 6:

DESCRIBE the methods and timing used to apply liquid or solid manure to land at or near the FACILITY since July 11, 2019, including the fields involved, the quantities applied, application rates, and whether any applications occurred within 48 hours before, during, or after a precipitation event.

RESPONSE TO INTERROGATORY NO. 6:

Travis incorporates his Preliminary Statement as if fully set forth herein. Travis further objects that this Interrogatory, including but not limited to its stated time period, is overbroad, unduly burdensome, and disproportionate to the needs of the case. Travis further objects that documents sufficient to respond to this Interrogatory are equally available to or already in the possession, custody or control of Plaintiff, including documents already produced in this action. Travis further objects to the use of the terms “structures and systems,” “design capacity,” “operational procedures,” and “installed” as vague and ambiguous.

Subject to and without waiving the foregoing objections, Travis responds as follows: See

Travis' Waste Management and Nutrient Management Plans, previously produced as TMD_000001-000125.

INTERROGATORY NO. 7:

DESCRIBE the FACILITY'S practices, procedures, or infrastructure for preventing surface water from coming into direct contact with confined animals, manure stockpiles, or other POLLUTANT sources.

RESPONSE TO INTERROGATORY NO. 7:

Travis incorporates his Preliminary Statement as if fully set forth herein. Travis further objects that this Interrogatory is overbroad, unduly burdensome, and disproportionate to the needs of the case. Travis further objects that documents sufficient to respond to this Interrogatory are equally available to or already in the possession, custody or control of Plaintiff, including documents already produced in this action. Travis further objects to the use of the terms "practices," "procedures," and "infrastructure," as vague and ambiguous.

Subject to and without waiving the foregoing objections, Travis responds as follows: See Travis' Waste Management and Nutrient Management Plans, previously produced as TMD_000001-000125.

INTERROGATORY NO. 8:

State whether YOU have ever applied for coverage under the Industrial General Permit (Order No. 2014-0057-DWQ as amended), and if not, explain why.

RESPONSE TO INTERROGATORY NO. 8:

Travis incorporates his Preliminary Statement as if fully set forth herein. Travis further objects that this Interrogatory is overbroad, unduly burdensome, and disproportionate to the needs of the case. Travis further objects to this Interrogatory as compound, as it includes multiple separate inquiries that should be broken down into distinct Interrogatories.

Subject to and without waiving the foregoing objections, Travis responds as follows: Per the requirements of the San Francisco Bay Regional Water Quality Control Board, Travis filed a Notice of Intent for Re-opening of Dormant Confined Animal Facilities to comply with the terms of Order No. R2-2016-0031. The Industrial General Permit does not cover dairies and is not

required for dairy operations.

INTERROGATORY NO. 9:

DESCRIBE all STORMWATER or wastewater sampling, monitoring, or testing conducted at or in connection with the FACILITY from July 11, 2019, to the present, including the dates, parameters tested, sampling locations, and test results.

RESPONSE TO INTERROGATORY NO. 9:

Travis incorporates his Preliminary Statement as if fully set forth herein. Travis further objects that documents sufficient to respond to this Interrogatory are equally available to or already in the possession, custody or control of Plaintiff. Travis further objects to the stated time period as overbroad, unduly burdensome, and disproportionate to the needs of the case. Travis further objects to the use of the terms “sampling,” “monitoring,” “testing,” and “parameters tested” as vague and ambiguous.

Subject to and without waiving the foregoing objections, Travis responds as follows: Travis’ dairy is monitored by a third party in compliance with the Regional Water Board’s Order R2-2016-0031. Results are reported directly to the Regional Water Board as part of its verification of Travis’ compliance with the Clean Water Act.

INTERROGATORY NO. 10:

IDENTIFY all documents, that constitute, summarize, DESCRIBE, relate to or refer to reports of laboratory analysis of STORMWATER or wastewater samples collected at or in connection with the FACILITY from July 11, 2019 to the present.

RESPONSE TO INTERROGATORY NO. 10:

Travis incorporates his Preliminary Statement as if fully set forth herein. Travis further objects that documents sufficient to respond to this Interrogatory are equally available to or already in the possession, custody or control of Plaintiff. Travis further objects to the stated time period as overbroad, unduly burdensome, and disproportionate to the needs of the case. Travis further objects to the use of the terms “reports” and “laboratory analysis” as vague and ambiguous.

Subject to and without waiving the foregoing objections, Travis responds as follows: Travis’ dairy is monitored by a third party in compliance with the Regional Water Board’s Order

1 R2-2016-0031. Results are reported directly to the Regional Water Board as part of its verification
2 of Travis' compliance with the Clean Water Act.

3 **INTERROGATORY NO. 11:**

4 IDENTIFY each person with knowledge of the FACILITY'S manure management,
5 STORMWATER management, or wastewater handling practices from July 11, 2019, to the
6 present, and state the nature of their knowledge.

7 **RESPONSE TO INTERROGATORY NO. 11:**

8 Travis incorporates his Preliminary Statement as if fully set forth herein. Travis further
9 objects that this Interrogatory, including but not limited to its stated time period, is overbroad,
10 unduly burdensome, and disproportionate to the needs of the case. Travis further objects to the
11 extent this Request seeks premature expert discovery, testimony or opinion. Travis further objects
12 to this Interrogatory as compound, as it includes multiple separate inquiries that should be broken
13 down into distinct Interrogatories. Travis further objects to the use of the term "wastewater
14 handling practices" as vague and ambiguous.

15 Subject to and without waiving the foregoing objections, Travis responds as follows: Travis
16 Moreda, Stephanie Moreda-Arend, and various employees. Additional persons include Travis'
17 experts, who will be disclosed at the appropriate time during the expert discovery phase of this
18 action.

19 **INTERROGATORY NO. 12:**

20 IDENTIFY each water body located on or downstream of the FACILITY that
21 DEFENDANTS contend is not a "water of the United States" within the meaning of the CLEAN
22 WATER ACT, including the basis for that contention and any evidence supporting it.

23 **RESPONSE TO INTERROGATORY NO. 12:**

24 Travis incorporates his Preliminary Statement as if fully set forth herein. Travis further
25 objects that this Interrogatory is overbroad, unduly burdensome, and disproportionate to the needs
26 of the case. Travis further objects to this Interrogatory as compound, as it includes multiple
27 separate inquiries that should be broken down into distinct Interrogatories.

28 Subject to and without waiving the foregoing objections, Travis responds as follows: Travis

1 does not discharge to jurisdictional waters of the United States as defined by law, including but not
 2 limited to the ruling of *Sackett v. Environmental Protection Agency*, 581 U.S. 651 (2023) and EPA
 3 and USACE’s proposed rule redefining “waters of the United States” following this ruling.

4 **INTERROGATORY NO. 13:**

5 DESCRIBE all efforts undertaken by DEFENDANTS since July 11, 2019, to determine
 6 whether the FACILITY is required to obtain NPDES permit coverage, including any
 7 communications with the STATE BOARD, REGIONAL BOARD, or EPA.

8 **RESPONSE TO INTERROGATORY NO. 13:**

9 Travis incorporates his Preliminary Statement as if fully set forth herein. Travis further
 10 objects that this Interrogatory, including but not limited to its stated time period, is overbroad,
 11 unduly burdensome, and disproportionate to the needs of the case.

12 Subject to and without waiving the foregoing objections, Travis responds as follows: Travis
 13 has reviewed the applicable requirements and obtained advice from experts and counsel. Per the
 14 requirements of the San Francisco Bay Regional Water Quality Control Board, Travis is covered
 15 by a general permit under the terms of Order No. R2-2016-0031. Travis does not discharge nor
 16 intend to discharge to surface water and therefore is not required to obtain coverage under an
 17 NPDES permit.

18 **INTERROGATORY NO. 14:**

19 IDENTIFY and DESCRIBE with specificity all modifications made to the FACILITY’s
 20 liquid waste storage or conveyance system during the RELEVANT TIME PERIOD, including but
 21 not limited to any modifications to increase the capacity of lagoons, retention basins, or other liquid
 22 waste containment structures, or to alter the means by which liquid waste is transported between
 23 areas where it is generated and where it is stored. For each such modification, state:

- 24 a. The date construction commenced and the date it was completed;
- 25 b. The nature and purpose of the modification;
- 26 c. The identity of the PERSON(S) or ENTITY(IES) who designed, constructed, or oversaw
- 27 the modification;

d. The engineering basis or design standard for the modification (e.g., 25-year, 24-hour storm event capacity); and

e. Whether any such modification was submitted to, reviewed, or approved by any governmental agency, and if so, identify the agency and the date and nature of such submission, review, or approval.

RESPONSE TO INTERROGATORY NO. 14:

Travis incorporates his Preliminary Statement as if fully set forth herein. Travis further objects that this Interrogatory is overbroad, unduly burdensome, and disproportionate to the needs of the case. Travis further objects that this Interrogatory seeks confidential information, including trade secrets, in the absence of a protective order. Travis further objects to this Interrogatory as compound, as it includes multiple separate inquiries that should be broken down into distinct Interrogatories. Travis further objects to the use of the terms “modification,” “liquid waste containment structures,” and “engineering basis or design standard” as vague and ambiguous.

Subject to and without waiving the foregoing objections, Travis responds as follows: See the documents already produced in this action, including Travis’ list and photographs of improvements (TMD_000126; TMD_000145) and the Confined Animal Facility Compliance Inspection Report by the San Francisco Bay Regional Water Quality Control Board dated November 1, 2024 (TMD_000129). See also Travis’ motion to dismiss and supporting exhibits. (ECF Nos. 38 through 38-3.) Travis continuously implements improvements at his Dairy in compliance with the Water Act, both before and after Plaintiff’s purported Notice of Violations.

INTERROGATORY NO. 15:

IDENTIFY the person most knowledgeable about any modifications made to the FACILITY’s liquid waste storage or conveyance system during the RELEVANT TIME PERIOD, including but not limited to any modifications to increase the capacity of lagoons, retention basins, or other liquid waste containment structures, or to alter the means by which liquid waste is transported between areas where it is generated and where it is stored.

RESPONSE TO INTERROGATORY NO. 15:

Travis incorporates his Preliminary Statement as if fully set forth herein. Travis further

1 objects that this Interrogatory is overbroad, unduly burdensome, and disproportionate to the needs
2 of the case. Travis further objects to this Interrogatory as compound, as it includes multiple
3 separate inquiries that should be broken down into distinct Interrogatories. Travis further objects
4 to the use of the undefined terms “RELEVANT TIME PERIOD,” “modification,” and “liquid
5 waste containment structures” as vague and ambiguous.

6 Subject to and without waiving the foregoing general and specific objections, Travis
7 responds as follows: Travis Moreda.

8 Dated: November 21, 2025

KING & SPALDING LLP



By: _____

Alexander Moore
Attorneys for Defendants
Travis Moreda Dairy and Travis Moreda

VERIFICATION

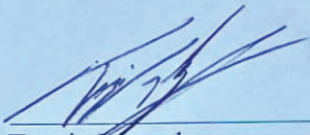
I, Travis Moreda, declare as follows:

I am a defendant in this action and the sole proprietor of Travis Moreda Dairy. I have read Defendants' Responses to Plaintiff's Interrogatories, Set One and am informed and believe that the facts and matters stated therein are true, and on that ground, allege that those facts and matters are true and correct.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 21st day of November 2025 in Petaluma, California.

By:


Travis Moreda

PROOF OF SERVICE

I am a citizen of the United States, over 18 years of age, and not a party to the within action. I am employed by the law firm of King & Spalding LLP. My business address is 621 Capitol Mall, Suite 1500, Sacramento, CA 95814.

On the date specified below, I served the within:

DEFENDANTS' RESPONSES TO PLAINTIFF'S INTERROGATORIES, SET ONE

on the parties in this proceeding, as addressed below, by causing true copies thereof to be distributed as follows:

Law Office of William Carlon
437 Post Street
Napa, CA 94559
william@carlonlaw.com; wverick@igc.org; brian@brianacree.com; dhwill7@gmail.com

☒ BY MAIL: I am readily familiar with the business practice for the collection and processing of correspondence for mailing with the United States Postal Service and the fact that the correspondence would be deposited with the United States Postal Service that same day in the ordinary course of business; on this date, the above-referenced correspondence was placed for deposit at Los Angeles, California, and placed for collection and mailing following ordinary business practices.

☒ BY ELECTRONIC MAIL: by transmitting the above-mentioned document by electronic mail transmission with attachment to the parties at the electronic mail transmission address set forth on the attached service list.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on November 21, 2025, at Sacramento, California.



Kendra Ford